

The Public Transport Users Association submit the following in regards to the East West Link (EW Link) – Comprehensive Impact Statement (CIS)

This submission responds principally to issues that arise under the public hearing matters referred to in Clause 7 (a) of the Terms of Reference announced on 21 October 2013 by the Minister for Planning:

"Whether the impacts of the project on the traffic performance of roads connecting to the project, and the surrounding road network, as well as on connectivity for public transport, cycling and pedestrians, have been appropriately addressed," by the Linking Melbourne Authority (LMA) within their Comprehensive Impact Statement (CIS).

This submission will highlight specific passages of the CIS and respond to them directly in order to highlight that the CIS does not appropriately address the impacts of the East-West Link on the traffic performance of roads connecting the project, and the surrounding road network as well as on connectivity for public transport, cycling and pedestrians.

Further, the CIS provides a false/erroneous projected scenario of how the East-West Link will affect the traffic performance of roads connecting the project, and the surrounding road network as well as on connectivity for public transport, cycling and pedestrians.

In particular the PTUA contests the following statements in the CIS as follow:

1. LMA:

"The project also offers the potential for substantial travel time savings for east-west trips, a reduction in congestion at critical points along the road network, a decrease in traffic volumes along Alexandra Parade and less through-traffic on surface roads in inner northern suburbs." (Chapter 7, Traffic and Transport, Comprehensive Impact Statement, p. 1)

PTUA RESPONSE:

- Travel time savings are a false/erroneous projected impact. The "potential" for time savings and reduction in congestion in certain places is neither a robust nor an adequate justification for expenditure on the scale proposed for the East West Link. The CIS is not sufficiently comprehensive to assess the purported time savings or congestion benefits. There is arguably more useful information on the impacts on a range of key road links in one newspaper article than conveyed in the CIS. For example, documents not released to the public show expected (not just "potential") increases in congestion on numerous roads (Gordon 2013). The full range of modelling should be released to the public and the public consultation restarted from scratch to allow sufficient time for this more comprehensive material to be properly considered.

- Travel time analysis published in 2012 shows that expanded road infrastructure has not sped up travel speeds on Melbourne's inner city roads (Odgers & Low 2012). Quite simply road expansion can never keep up with growth in travel demands.
- With a population of 4 million, it is already impossible to accommodate Melbourne's travel demands through private automobile travel due to the space intensive nature of the private automobile. Image 1 illustrates the spatial efficiency of public transport as compared with private automobiles.
- The residential and economic demands of Melbourne can only be effectively managed through modal shift from single occupancy automobiles to walking, cycling and public transport. To quote the current state government: "As Melbourne grows from its current four million people to about 6.5 million by 2050, the city will need to accommodate an additional eight million person trips per day. This growth means that, proportionally, our reliance on public transport will need to increase." (*Plan Melbourne*, State Government of Victoria 2013, p. 72)
- A mode shift approach to traffic management requires effective governance and public transport infrastructure. The East West link indicates the current state government's over-reliance on a car based transport network. This infrastructure investment matches their governance decisions such as eliminating Public Transport Victoria's explicit mode share target (Victorian Auditor General 2013), a decision criticised by the Victorian Auditor General in their report *Managing Congestion 2013*. In particular, the Auditor-General found "Public reporting by DOT/ PTV against the prior state-wide target to increase the mode share of public transport to 20 per cent by 2020 was discontinued at the end of 2010 following the change in government. The status of this target is presently uncertain and PTV has yet to establish alternative targets for mode share." The Auditor-General recommended that explicit mode shift strategies and targets be developed (Victorian Auditor-General, *Managing Congestion* April 2013, p. 11).

Image 1: Road space efficiency of buses, bicycles, cars (Cycling Promotion Fund, 2012)



2.

LMA:

“To improve road based transport connectivity between the east of Melbourne and the Port of Melbourne and the wider metropolitan region and the State, while maintaining the connectivity of existing local transport routes.” (Chapter 7, p.1)

PTUA RESPONSE:

- The Eastern Freeway is of relatively low importance for freight movement compared to other arterial roads.
- An inner-city toll road does not adequately address traffic performance that is currently impeded by a reliance on single occupancy automobiles. To the extent that traffic forecasts have been revealed showing the expected impact of the proposed East-West Link, they show increased traffic volumes on key freight routes which will impede the efficiency of freight movements.
- The greatest impediment to road based connectivity between the east of Melbourne and the Port of Melbourne, as well as Melbourne and Victoria more broadly is the inadequate development of mass transit options and resulting car dependency.
- Residents across Melbourne are without modal choice (Commissioner for Environmental Sustainability Victoria, *State of Environment Victoria*, November 2013; BITRE 2013). Forced into cars, single occupant vehicles take up an excessive amount of road space creating traffic congestion.
- To improve road based connectivity a modal shift approach is required from the private motor car to public transport and active transport (cycling and walking). Rather than road expansion we need to use existing roads more productively through increased mass transit travel. This will improve travel flows for essential road based trips by automobile, including freight deliveries and by tradespersons.
- A mode shift approach to traffic management requires effective governance and public transport infrastructure. The East West link indicates the current state government’s dedication to a car based transport network. As discussed above, this infrastructure investment matches their governance decisions such as eliminating Public Transport Victoria’s explicit mode share target (Victorian Auditor General 2013). A decision criticised by the Victorian Auditor General in the report *Managing Congestion 2013*.

3.

LMA:

“As discussed in Chapter 2, Melbourne’s strong population growth over the next 30 years – and the city’s changing industrial base – will have a significant impact on the volume of traffic moving around the city and on traffic flows and patterns across the transport network.”(Chapter 7, p. 1)

PTUA RESPONSE:

- An inner-city toll road does not appropriately address the traffic performance impacts derived from population growth.
- As quoted before, the current state government has emphasised that the projected population growth in Melbourne and the associated growth in travel demand requires a modal shift management approach. “As Melbourne grows from its current four million

people to about 6.5 million by 2050, the city will need to accommodate an additional eight million person trips per day. This growth means that, proportionally, our reliance on public transport will need to increase." (Plan Melbourne, p. 72)

- The city's changing industrial base - more service oriented - given rational planning outcomes will significantly change the composition of trips people make to ones most conducive to mass transit.
- A mode shift approach to traffic management requires effective governance and public transport infrastructure. The East West link indicates the current state government's dedication to a car based transport network. This infrastructure investment matches their governance decisions such as eliminating Public Transport Victoria's explicit mode share target (Victorian Auditor General 2013). A decision criticised by the Victorian Auditor General in their report *Managing Congestion* 2013.

4.

LMA:

"Figure 7-4 shows LATM locations in the inner north and the scarcity of continuous east-west arterial roads through this area." (Chapter 7, p. 4)

Image 2: Melbourne's inner north road network (LMA 2013)



PTUA RESPONSE:

- The LMA's assessment that there is a scarcity of continuous east-west arterial roads through Melbourne's inner north is inaccurate and thereby does not appropriately address traffic performance.
- There are a number of east-west arterial roads in Melbourne's inner north; Barkers Road -Victoria Street; Eastern Freeway -Alexandra Parade; and, Bell Street. An over-

preponderance of single occupancy automobiles on these roads is currently creating congestion on these arterials and restricting east-west connectivity.

- To provide east-west road *space* for journeys most sensibly taken by private motor car a modal shift approach is required. Rather than road expansion we need to use existing roads more productively through increasing public transport mode share. This will improve travel flows for essential road based trips such as mobile essential services, tradespersons and freight.
- Existing east-west public transport services are poorly developed and currently fail to offer a realistic transport option for many people. Provision of frequent east-west public transport services that are properly integrated with existing north-south services would greatly expand the range of journeys that could be shifted away from private motor vehicles. This would require a comparatively small investment compared to that proposed for the East West Link, and greatly enhance east-west mobility in the area.
- A mode shift approach to traffic management requires effective governance and public transport infrastructure. The East West link indicates the current state government's dedication to a car based transport network. This infrastructure investment matches their governance decisions such as eliminating Public Transport Victoria's explicit mode share target. As discussed about this decision was criticised in the Victorian Auditor General's report, Managing Congestion April 2013, who recommended its reinstatement.

5.

LMA:

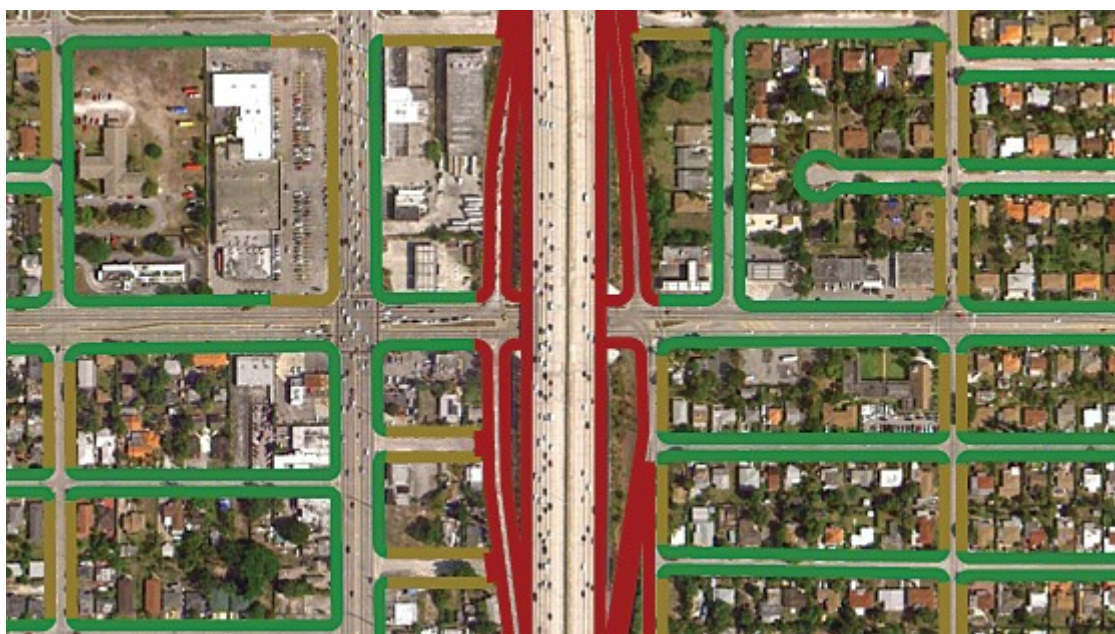
"Transforming the transport system will be critical to the success of this model, and East West Link is one of the city-shaping investment projects supporting delivery of a more productive Central City and urban renewal." (Chapter 7, p. 6)

PTUA RESPONSE:

- East West Link does not in any proper sense contribute to transforming the transport system in Melbourne to deliver a more productive Central City and urban renewal. It would do the opposite, as it is an outdated and inefficient model for mobility in a highly urbanised and suburbanised setting with a growing population.
- To the extent that East West Link is "city shaping", it will be shaping Melbourne into a city that relies on more and longer motor vehicle journeys: "the number of vehicle kilometres travelled within the network would increase by 0.4 per cent (800,000 kilometres)" (Chapter 7, p.17). This will entrench car dependence among people who have a car, and exacerbate transport disadvantage among those who do not.
- Productive cities rely on space-efficient public transport that supports agglomeration economies and service industry clusters. High capacity roads encourage high volumes of low occupancy vehicles that consume large areas of land while in motion and while parked. The excessive space requirement of private motor vehicles, and dispersed land use encouraged by their use, prevents agglomeration and thus hinders productivity.
- The use and occupation of land along the edges of freeways is quite sensibly prohibited from use by Melbourne's planning scheme. This is typical practice within developed nations around the world. As use is prohibited around freeways East West Link will reduce opportunities for urban renewal.

- Further, land along the edges of the East West Link will become unproductive for economic activity and less attractive for residential development, in sharp contrast to the enhancement of utility and uplift in land values experienced in close proximity to mass transit systems.
- The construction of the East West Link in such close proximity to Melbourne’s central business district will impose a tight boundary restricting future expansion of Melbourne’s most productive and profitable economic region.
- Image 3 illustrates land values developers attribute to land around a freeway in Miami. The red frontages along the freeway edges and interchange are deemed worthless by developers.
- In contrast, the value and utility of land, commercial and residential, within reasonable proximity of reasonable public transport is recognisably greater. This is also a potential funding source for public transport systems.

Image 3: Melbourne’s inner north road network (LMA 2013)



Green frontages: full value ~ Olive frontages: partial value ~ Red frontages: worthless

6.

LMA:

“As noted in Section 7.2.1, a number of east-west journeys divert to east-west local streets and arterial roads to avoid congestion on major cross-city routes. Without action to improve cross-city road connections, this ‘rat running’ is likely to increase.” (Chapter 7, p. 6)

PTUA RESPONSE:

- A significant number of journeys divert to local streets as this is where the majority of Eastern Freeway traffic is destined (e.g. inner north, CBD and surrounds). Much of the congestion on routes in the area can be tied to the current inadequacy of public transport services in meeting these transport needs, and resulting high volume of low occupancy vehicle movements. This ‘rat-running’ will not be alleviated by a road tunnel

that overshoots the destination of the traffic. A more effective response would be improving non-car transport options for both radial and cross-town journeys so that road space can be more efficiently utilised.

- To suggest that a toll road will decrease 'rat running' is a false projected impact.
- By failing to consider mass transit investment alternatives the LMA does not appropriately address 'rat running' on east-west local streets.
- In order to reduce cross-city traffic on local streets, the major cross-city routes need to be more productive – shifting people more efficiently via on road public transport as well as on rail lines will encourage people out of their cars reducing the number of single occupancy vehicles which create congestion.
- A toll road may increase rat running amongst a large proportion of motorists sensitive to additional incremental motoring costs and relatively less sensitive to time losses.

7.

LMA:

"This central Melbourne economy relies on good quality public transport access for a rapidly growing pool of employees. The largely radial on-road public transport routes (trams and buses) crossing the inner north are currently operating in a constrained environment and are affected adversely by the need to accommodate east-west traffic. For example, city tram services on north-south streets (such as routes 86, 96 and 112 that run along Nicholson, Smith and Brunswick streets) experience significant delay as a result of east-west road traffic competing for priority at signalised intersections. These tram routes are critical enablers of the inner city knowledge economy." (Chapter 7, p. 8)

PTUA RESPONSE:

- Melbourne's largely radial on-road public transport routes are constrained by a lack of funding, good governance, passenger orientated route and mode interchanges, and, priority lanes.
- East West Link does not in any proper sense contribute to transforming the transport system in Melbourne to deliver a more productive economy. It would do the opposite, as it is an outdated and inefficient model for mobility in a highly urbanised and suburbanised setting.
- Those routes identified to have improved punctuality as a result of the East West Link already rate as some of the top performers in terms of tram punctuality within Melbourne's tram network (VicRoads 2011) and the performance on these routes should be enhanced by the simple application of tram priority measures at intersections.
- The CIS fails to note the expected significant increase in traffic on several public transport corridors as a result of East West Link (Gordon 2013). This would hamper the movement of road-based public transport, along with other traffic on those roads, and undermine public transport access to central Melbourne.
- A railway line to Doncaster would eliminate delays caused by road congestion currently suffered by public transport passengers utilising road-based DART services along the Eastern Freeway, Hoddle Street and Victoria Parade. The proposed alignment of the East West Link would commandeer the long-standing rail reservation and unduly complicate the construction of a Doncaster rail line, thus undermining the provision of good quality public transport access to central Melbourne.

8.

LMA:

"The East West Link – Eastern Section would improve cross-city connectivity when it becomes operational." (Chapter 7, p. 12)

PTUA RESPONSE:

- An inner-city toll road does not adequately address traffic performance that is currently impeded by a reliance on single occupancy automobiles.
- The greatest impediment to road based connectivity between the east of Melbourne and the Port of Melbourne, as well as Melbourne and Victoria more broadly is the limited availability and inefficiency of mass transit options.
- Residents across Melbourne are without modal choice (Commissioner for Environmental Sustainability Victoria 2013; BITRE 2013). Forced into cars, single occupant vehicle travelers absorb too great a proportion of available road space thus creating traffic congestion.
- To improve road based connectivity a modal shift approach is required. Rather than road expansion we need to use existing roads more productively through increased mass transit travel. This will improve travel flows for essential road based trips such as mobile essential services, freight and tradespersons.
- Cross-city connectivity would also be improved by provision of an extensive network of well-integrated frequent public transport services. This would also better serve the needs of a growing population.

9.

LMA:

"The assessment followed the iterative approach outlined in Chapter 3 and was primarily a desktop audit of the Reference Project, available existing traffic data and the results of strategic transport modelling for the East West Link – Eastern Section undertaken by Veitch Lister Consulting in 2013." (Chapter 7, p. 13)

PTUA RESPONSE:

- We challenge the heavy reliance on traffic modelling to substantiate this project. The various problems associated with traffic modelling means that the CIS has not appropriately addressed improving access for citizens and business.
- Issues related to the flawed nature of traffic modelling is documented academically (Lee Jr 1973; Evens et al. 2007) as well as through experience Australian examples being the failed Clem7 tunnel and Sydney's Cross City Tunnel.
- The publically available modelling undertaken by Veitch Lister Consulting cannot be regarded as valid as the assumptions embedded within these traffic models produce a biased forecast.
- The Age 9 December 2013: "The Naphthine government's own secret traffic modelling reveals hundreds of thousands of motorists face more rather than less congestion as a direct result of the \$6 billion to \$8 billion project."
- Traffic modelling is recognised as a problematic 'science' which creates as many questions as answers (Lee Jr 1973; Evens et al. 2007). While potentially useful for public

transport planning, traffic modelling cannot provide the substantive basis of large investment. This should be guided by a robust strategic focus based upon a much greater modal contribution from public transport.

- The full suite of traffic modelling, detailing all assumptions used, should be released and the assessment process placed on hold to allow the community to properly digest them.

10 LMA:

“Services along the South Morang and Hurstbridge rail line (Precinct 1), the Upfield rail line (Precinct 3) and Tram Route 55 (Precinct 3) would be temporarily disrupted during construction... In addition, construction of the Elliott Avenue interchange would require the tracks for Tram Route 55 to be realigned slightly to the east to accommodate access arrangements for the interchange.” (Chapter 7, p 38)

PTUA RESPONSE:

- The three effected train lines alone carry well over 79,000 passengers a day. This means that during construction of the East West Link there is the potential for well over 80,000 more cars to be on the road during the am and pm peak periods.
- Given the potential scale of the engineering work involved services on these important public transport routes could be suspended for very long periods, causing significant disruption.

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